

WILLIAM L. OSTERHOUDT (SBN 043021)
 Law Offices of William Osterhoudt
 135 Belvedere Street
 San Francisco, California 94117
 Telephone: (415) 664-4600
 Email: osterhoudt@aol.com

MICHAEL STEPANIAON, ESQ. (SBN 37712)
 Law Offices of Michael Stepanian
 819 Eddy Street
 San Francisco, CA 94109
 Telephone: (415) 771-6174
 Fax: (415) 474-3748
 Email: mstepanian@sbcglobal.net

Attorneys for Defendants
 XANTHE LAM AND ALLEN LAM

UNITED STATE DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	Case No. CR 18-00527 WHA (JCS)
)	
Plaintiff,)	STIPULATION AND [PROPOSED]
vs.)	ORDER PERMITTING
)	DEFENDANTS TO TRAVEL IN
XANTHE LAM, ALLEN LAM)	CALIFORNIA WITH PERMISSION
Defendants.)	OF PRE-TRIAL SERVICES
)	
)	
)	

STIPULATION

As a part of their conditions of Pre-Trial release, defendants Xanthe Lam and Allen Lam have been required to seek court approval for travel outside the Northern District of California. With the approval of their Pre-Trial Services Officer, Mr. Josh Libby, they are requesting permission to travel throughout California with the permission of Pre-Trial Services. The United States is agreeable to this request, provided defendants obtain permission from Pre-Trial Services

1 to travel outside the Northern District, and provide their itinerary to Pre-Trial Services for each
 2 such request. The Pre-Trial Services Officer, Mr. Libby, has no objection to these changes in the
 3 defendants' bond conditions.

4 Accordingly, it is stipulated and agreed between the parties that the conditions of Pre-Trial
 5 release for defendants, Allen Lam and Xanthe Lam shall be modified so that they may travel
 6 within the State of California with the permission of their Pre-Trial Services Officer. When such
 7 travel within California is requested, in advance of their travel, defendants shall provide Pre-Trial
 8 Services with their itinerary and shall obtain the permission of their Pre-Trial Services Officer.

9
 10
 11 DATED: December 16, 2019

Respectfully submitted,

12 /s/ Michael Stepanian

13 Michael Stepanian

14 Counsel for Defendant Allen Lam

15 /s/ William L. Osterhoudt

16 William L. Osterhoudt,

Counsel for Defendant Xanthe Lam

17 /s/ Sheila Armbrust

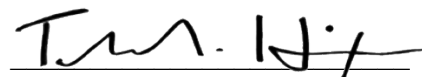
18 Sheila Armbrust

19 Assistant United States Attorney

20
 21 ~~[PROPOSED]~~ ORDER

22 On stipulation of the parties, and good cause appearing, it is hereby ordered that the
 23 conditions of the release for defendants Xanthe Lam and Allen Lam shall be modified to allow
 24 them to travel within the state of California with the permission of the Pre-Trial Services Officer.
 25 When requesting such travel, and in advance of their travel, the defendants shall provide their Pre-
 26 Trial Services Officer with their itinerary.

27 DATED: December 23, 2019

28 

~~HON. JOSEPH C. SPERO~~

~~Chief U.S. Magistrate Judge~~

THOMAS S. HIXON